

Amy Sommer Anderson (STATE BAR NO. 282634)
 anderson@aroplex.com
 AROPLEX LAW
 156 2nd Street
 San Francisco, California 94105
 Telephone: 415-529-5148
 Facsimile: 415-970-5016

Attorney for Plaintiff,
 CARLA CAMARGO

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

CARLA CAMARGO, an individual,
 Plaintiff,

v.

MILTON MILTIADOUS, an individual; and
 DOES 1-10, inclusive,
 Defendants.

Case No.: 3:14-cv-04490-JSC

**PLAINTIFF'S REQUEST TO EXTEND
 TIME TO FILE MOTION FOR
 DEFAULT JUDGMENT**

Date: February 18, 2016
 Place: Courtroom F, 15th Floor
 Honorable: Jacqueline Scott Corley

Plaintiff CARLA CAMARGO ("Plaintiff") respectfully request an order of the Court pursuant to L.R. 6-1(b) extending time for Plaintiff to file her motion for default judgment by no fewer than three (3) days. The following points and accompanying Declaration of Amy Sommer Anderson are provided in support of this request.

The Court entered default against the defendant on January 27, 2016. Plaintiff's motion is currently scheduled as due today, February 18, 2016. Despite diligent follow-up, Plaintiff only just today was able to compel production of account information subpoenaed from Google and due for production February 1, 2016. This information is critical to Plaintiff's Motion since it is

1 the only direct evidence proving Defendant's ownership of the accounts under which the
2 defamatory online posts were made.

3 Accordingly, Plaintiff seeks to extend the time to file her motion for default judgment by
4 at least three (3) days to enable Plaintiff to review the new evidence and finalize her motion.

5
6 There is no harm in extending the time for Plaintiff's filing since default has already been
7 entered against Defendant Miltiadous, and ensuring a default judgment is determined on all
8 available evidence is in the interest of justice.

9 The requested time modification would have no effect on the schedule for this case, as no
10 schedule has previously been entered and no trial date is necessitated.

11
12
13 Dated: 02/18/2016

Respectfully Submitted,

14
15 /s/ AMY SOMMER ANDERSON

Amy Sommer Anderson

AROPLEX LAW

156 2nd Street

San Francisco, CA 94105

415-529-5148

Attorney for Plaintiff,

CARLA CAMARGO

**DECLARATION OF AMY SOMMER ANDERSON IN SUPPORT OF PLAINTIFF'S REQUEST TO
EXTEND TIME**

I, Amy Sommer Anderson, hereby declare:

1. The Court entered default against the defendant on January 27, 2016. Plaintiff's motion is currently scheduled as due today, February 18, 2016.

2. Despite diligent follow-up, I only just today was able to compel production of account information subpoenaed from Google and due for production from them to us on February 1, 2016.

3. The information received late this afternoon is critical to Plaintiff's Motion since it is the only direct evidence proving Defendant's ownership of the accounts under which the defamatory online posts were made.

4. There is no harm in extending the time for Plaintiff's filing since default has already been entered against Defendant Miltiadous, and ensuring a default judgment is determined on all available evidence is in the interest of justice.

5. The requested time modification would have no effect on the schedule for this case, as no schedule has previously been entered and no trial date is necessitated.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct and that this declaration is executed on this 18th day of February 2016, at San Francisco, California.

Respectfully Submitted,

/s/ AMY SOMMER ANDERSON

AROPLEX LAW
A California Law Practice

Amy Sommer Anderson (STATE BAR NO. 282634)
anderson@aroplex.com
AROPLEX LAW
156 2nd Street
San Francisco, California 94105
Telephone: 415-529-5148
Facsimile: 415-970-5016

Attorney for Plaintiff,
CARLA CAMARGO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CARLA CAMARGO, an individual,

Plaintiff,

v.

MILTON MILTIADOUS, an individual; and
DOES 1-10, inclusive,

Defendants.

Case No.: 3:14-cv-04490-JSC

**[PROPOSED] ORDER EXTENDING
TIME TO FILE**

After consideration of Plaintiff's Request to Extend Time, and for good cause appearing:

IT IS SO ORDERED that the deadline for Plaintiff to file her Motion for Default

Judgment is extended to _____, 2016.

Dated: _____, _____

By: _____

Hon. Jacqueline Scott Corley
U.S. District Magistrate Judge